

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
RECEIVED

for the

District of

MAY 16 2022

Division

TONY R. MOORE, CLERK
BY: WA
DEPUTY

Case No. 22-cv-1314

(to be filled in by the Clerk's Office)

Burnell LaFrance

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jury Trial: (check one) ☐ Yes ☐ NoSt. Martin Truck Stop & Casino

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Burnell LaFrance
1210 Fulton St.
New Iberia Iberia
Louisiana 70560
337 706 2295
burnelllafrance09@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

St. Martin Truck Stop & Casino
owner and management
1339 SE Evangeline Thruway
Broussard
Louisiana 70518
337 364 8616

Defendant No. 2

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 3

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 4

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Burnell LaFrance, is a citizen of the State of *(name)* Louisiana.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of *(foreign nation)* _____.

b. If the defendant is a corporation

The defendant, (name) St. Martin Truck Stop & Casino is incorporated under the laws of the State of (name) _____, and has its

principal place of business in the State of (name) Louisiana.

Or is incorporated under the laws of (foreign nation) _____,

and has its principal place of business in (name) Broussard, Louisiana.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Feb. 27th 2022 Improperly And/or Incorrectly Trained Plaintiff resulting in Wrongful Termination Retaliated because of complaint made by Plaintiff for hostile work environment

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff only did what the Plaintiff was told to, 6 different work sites had six or multiple rules which varied none of which was in writing At work site duties or Post Orders

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 5/16/2022

Signature of Plaintiff

Printed Name of Plaintiff

Burnell LaFrance
Burnell LaFrance

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

22-cv-1314

United States District
Court Western District of
Louisiana Lafayette Division

Burnell LaFrance
V/S
St. Martin Truck
Stop & Casino

U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
RECEIVED

MAY 16 2022

TONY R. MOORE, CLERK
BY: ml
DEPUTY

LaFrance ASK the
Honorable United States District
Court Western District Court of
Louisiana Lafayette Division to
Proceed Pro Se in the Form
of Purpus against St. Martin
Truck Stop And Casino For
Improperly And/or Incorrect

Training in which lead to A
Wrongful termination From An
Knowingly Already Hostile Work
environment. Multiple times
A middle Age Caucasian Who
Worked AS A Contract Worker
with Southern Defense And Security
AS well stop by with his parents
he wasn't Fired or ASK to leave
Petitioner ASKed management
if we could stop by And Play
and the management Said yes.

Because one (1) the Plaintiff is A Contract Worker and Two (2) Petitioner/Plaintiff does Not open the machine. Later After the termination Management of the St. Martin Truck Stop And Casino said by Communicating over the phone She thought Petitioner was ASKING About Another Site And said that the Southern Defense and Security should have explained it better.

There for IF All Six Sites
has different rules and None
or in the Duty or Post order
books, It's obvious it wasn't
Any Fault of A Subordinate
Worker who was told they could
do something observed other
doing it, Ordered by Manage-
ment and Staff to check
the Bill collectors And/or to
Play A Gaming device when
A Customer complains About

A glitch malfunctional Freeze of said device is simply Entrapment for termination and then to instigate Criminal trespassing charges on the Plaintiff for again doing what Petitioner was told to or could. Note the same Management would Always want to take photo's of the Plaintiff stating "Smile". Knowing First hand of the hostile work environment, Had the Plaintiff

Committed any of the Work Place
Infraction others have done Petitioner
Would have been terminated Also
nevertheless closing Every word
is true and accurate LaFrance
had to stay in Guidelines of Not
Trespassing to get answers of what
Management At St. Martin Truck
Stop said first hand as well as
what Southern Defense and Security
did And did not do Was so
close to obstruction of Justice
It was a delay in obtaining Justice

Committed Any of the Work
Place Infraction others have
done Petitioner would of been
terminated And never the less
closing Every word is true
and accurate LaFrance had
to stay in guidelines of not
trespassing to get answers of
what management At ~~the~~ Truck Stop
said First hand. and what Southern
Defense And Security did and
didn't do was so close to
obstruction of Justice, and it's
True Justice is hard to obtain

In which LaFrance Humbly
ASK the Honorable Court
to hear prayer of Petitioner

yours Truly
Burnell LaFrance
~~Burnell LaFrance~~
1210 Fulton St
New Iberia, LA
70560
SS # 436-25-1026
(337) 706-2295

(End)